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October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- **NIACIN (VITAMIN B-3)**
Pursuant to 21 CFR Part 101.93, American Specialty Health & Wellness (ASHW) files the following Statement of Nutritional Support for the Dietary Supplement marketed as: **NIACIN (VITAMIN B-3)**

1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr.
Ste. 250, San Diego CA 92108

2) Text of Nutritional Support Statement being Made:
"Vitamin B-3, also known as niacin is a water soluble vitamin that acts as a coenzyme in the body. It assists in the breakdown and absorption of proteins, fats, and carbohydrates. Excessively consuming sugars and starches or taking antibiotics can deplete the body's available supply of B-3. Vitamin B-3 supports a healthy cardiovascular and blood triglyceride level. It also supports a healthy endocrine and nervous system, as well as a healthy skin, tongue, and digestive system."

3) Name of dietary ingredient(s): See Attached Product Label

4) Brand Name: **NIACIN (VITAMIN B-3)**

5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

A handwritten signature in dark ink, appearing to read "Doug Metz". The signature is fluid and cursive, with a large, stylized "D" and "M".

Dr. Doug Metz
Vice President

Niacin (Vitamin B-3)

Description:

Vitamin B-3, also known as niacin is a water-soluble vitamin that acts as a coenzyme in the body. It assists in the breakdown and absorption of proteins, fats, and carbohydrates. Excessively consuming sugars and starches or taking antibiotics can deplete the body's available supply of B-3. Vitamin B-3 supports a healthy cardiovascular and blood triglyceride level. It also supports a healthy endocrine and nervous system, as well as a healthy skin, tongue, and digestive system.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions For Use: Take 1 capsule per day.

Storage: Keep tightly closed in a cool, dry place.

Caution/Warning: As with any supplement, herb or medication, do not use it while pregnant or lactating, or provide it to a child without consulting a physician. Long term mega-doses may cause liver damage.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feel while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SPECIALTY HEALTH & WELLNESS™
PO BOX 509040, SAN DIEGO, CA 92150-9040

NIACIN (VITAMIN B-3) DIETARY SUPPLEMENT

60 CAPSULES

Premium Products for Your Health & Wellness™

Supplement Facts

Serving Size: 1 Capsule – Servings Per Container: 60

	Amount Per Serving:	%Daily Value
Niacin (as inositol nicotinate)	400mg	2,000%

Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide.

Niacin (Vitamin B-3) is free of wheat, corn, dairy, sucrose, starch, salt and yeast.